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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

JOHN DOE 1, JOHN DOE 2, JOHN DOE 3,)	
JOHN DOE 4, JOHN DOE 5, JOHN DOE 6,)	Case Number: 3:22-cv-01559-LB
JOHN DOE 7, JOHN DOE 8, JOHN DOE 9,)	
JOHN DOE 10, JOHN DOE 11, JOHN DOE)	DEFENDANT UNIVERSITY OF SAN
12, JOHN DOE 13, and JOHN DOE 14)	FRANCISCO'S STATEMENT IN
individually and on behalf of all others)	SUPPORT OF SEALING REQUEST (ECF
similarly situated,)	No. 329)
)	
Plaintiffs,)	Civil Local Rule 79-5(f)
)	
vs.)	Judge: Hon. Laurel Beeler
)	Trial Date: None Set
)	
NATIONAL COLLEGIATE ATHLETIC)	
ASSOCIATION, THE UNIVERSITY OF)	
SAN FRANCISCO, ANTHONY N. (AKA)	
NINO) GIARRATANO, and TROY)	
NAKAMURA,)	
)	
Defendants.)	
)	
)	
)	

**DEFENDANT UNIVERSITY OF SAN FRANCISCO'S STATEMENT IN SUPPORT OF
SEALING REQUEST**

CASE NO. 3:22-CV-01559-LB

ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Civil Local Rule 79-5(f), Defendant University of San Francisco (“USF”) submits this statement in support of Plaintiffs’ Administrative Motion to Consider whether Another Party’s Material Should be Sealed (ECF No. 329). Plaintiffs’ Motion pertains to the following items all filed on April 22, 2025: (i) Exhibits G and H to the Declaration of Michelle A. Lamy in Support of Plaintiffs’ Opposition to USF’s Motion for Leave to File a Partial Motion for Summary Judgment on the Statute of Limitations (ECF No. 328-8, Ex. G; ECF No. 328-9 Ex. H); and (ii) portions of Plaintiffs’ concurrently filed Opposition to USF’s Motion for Leave to File a Partial Motion for Summary Judgment on the Statute of Limitations that quote from Exhibits G and H (ECF No. 328).

The materials subject to sealing were marked by USF as “Highly Confidential” under the Stipulated Protective Order that has been entered in this case. The materials contain testimony from a private arbitration between USF and Coach Giarratano that relates to this matter. The Court previously held regarding materials from that arbitration that “[c]ompelling reasons justify sealing because, to promote efficient resolution of disputes in arbitration, parties can and should rely on such designations without fearing wholesale public disclosure in any subsequent litigation.” Order Granting Revised Motions to File Under Seal at 3 (Mar. 25, 2025), ECF No. 321.

For the foregoing reasons, USF respectfully requests that this Court keep sealed ECF Nos. 328; 328-8; 328-9; 329-2; 329-3; and 329-4.

1 Dated: April 29, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2025 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record who receive CM/ECF notifications.

/s/ *Julienne Pasichow*

Julienne Pasichow